

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Christopher S. Graham and	:	Case No. 15-70664-JAD
Sara N. Graham,	:	
Debtors	:	
	:	Chapter 13
US Bank Trust National Association,	:	
Movant	:	Related to Document No. 96
v.	:	
	:	
Christopher S. Graham , and	:	Document No.
Sara S. Graham, and Ronda J.	:	
Winnecour, Trustee,	:	
Respondents	:	

Response in Opposition to the Motion
for Relief from the Automatic Stay

Now come the respondents, by and through their attorneys, and file this Response in opposition to the Motion for Relief from the automatic stay.

1. The property for which the Movant seeks relief is not owned by either Debtor-Respondent.
2. The mortgage furnishing the basis for the request is not signed by either Debtor-Respondent.
3. The Debt which is the basis of the Movant's claim was not incurred or signed for by either Debtor-Respondent.

4. As the documents attached to the motion show, the mortgage and note are in the name of "Christopher Graham and Cynthia L. Graham". Those individuals are not the Respondents in this case. The Respondent Christopher S. Graham has never been married to a "Cynthia L. Graham".

Wherefore, the Respondents pray for the entry of an Order denying the relief requested.

Respectfully submitted,

/s/Michael N. Vaporis
Michael N. Vaporis (46333)
Katrina M. Kayden (204563)
Allison B. Gordon (321059)
Law Offices of Michael N. Vaporis
26 South Sixth Street
Indiana, Pennsylvania 15701
(724) 465-5653
Attorney for Debtors/Respondents